

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of:

Items listed on Attachment A

)
)
) Case No. 19-MJ-1357
)
)
)

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A

located in the Eastern District of Wisconsin, there is now concealed:

See Attachment B

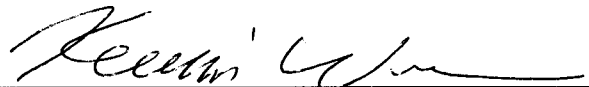
The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: Title 18, United States Code, Sections 1591(a) and (d); and 2423(c) and (e).

The application is based on these facts: See attached affidavit.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Kevin C. Wrona, Special Agent, HSI
Printed Name and Title

Sworn to before me and signed in my presence:

Date: 12/6/19


Judge's signature

City and State: Milwaukee, Wisconsin

Hon. William E Duffin, U.S. Magistrate Judge

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41 FOR A
WARRANT TO SEARCH AND SEIZE**

I, Kevin C. Wrona, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of forensic images of electronic devices, which are currently in law enforcement possession as described in Attachment B.
2. I am a Special Agent with the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”), and have been so employed since June 2010. I am currently assigned to the HSI Office of the Resident Agent in Charge in Milwaukee, Wisconsin. My duties include investigating criminal violations relating to child sexual exploitation and child pornography. I have received training in the investigation of child pornography and child sexual exploitation offenses.
3. This affidavit is submitted in support of an application for warrant to search for contraband and evidence, fruits, and instrumentalities of violations of Title 18, United States Code § 1591(a) and (d) (sex trafficking of children); and 18 U.S.C. § 2423(c) and (e) (engaging, attempting to engage, and conspiring to engage in illicit sexual conduct in foreign places). This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. Moreover, I have learned some of the information set forth below through my review of the case-related documents, as well as through communications with other law enforcement officials.

IDENTIFICATION OF THE ITEMS TO BE EXAMINED

4. The property to be searched consists of exact forensic copies of the electronic devices seized from the apartments of STENSON on August 6, 2019 by the Royal Thai Police, which include: three (3) SanDisk flash drives, one (1) Apacer flash drive, six (6) Kingston flash drives, one (1) Nokia mobile phone, one (1) Dell laptop computer, one (1) PC computer, one (1) Acer external hard drive (serial number: LCEXH0A025215005D63600), one (1) Samsung mobile phone (serial number: R58K73Q17GE) with Globe Network sim card, one (1) Seagate external hard drive (serial number: NAAP0MVJ), two (2) miscellaneous sim cards, one (1) Sony 32GB memory stick, one (1) Tsunami external hard drive, one (1) Samsung flash drive, one (1) Transcend flash drive, one (1) Apple iPod Touch (serial number: DJ6MX153DT75), one (1) Apple iPod Touch (serial number: 8L0269MC75J), one (1) Sony 1GB memory stick) and one (1) HP all-in-one computer (serial number: 18WW2Y5T60). Such forensic images are contained on one (1) Western Digital Gold 4 TB hard drive (serial number K4KA363B).

The Western Digital Gold 4 TB hard drive is currently at the U.S. Department of Homeland Security Office located at 790 N. Milwaukee Street, Milwaukee, Wisconsin, in evidence.

5. The applied-for warrant would authorize the analysis of the forensic images contained on the Western Digital Gold 4 TB hard drive for the purpose of identifying electronically stored data particularly described in Attachment B.

PROBABLE CAUSE

6. On June 20, 2018, I received CyberTip (CT) 35013606 from NCMEC regarding multiple Facebook usernames that appeared to be engaged in sexually explicit communications with minors. The CT was reported to NCMEC directly from Facebook, and included Facebook

usernames, Facebook user ID numbers, e-mail addresses and internet protocol (IP) addresses used to access the Facebook accounts. The Facebook service can be accessed from devices with Internet connectivity, such as personal computers, tablets and smartphones. After registering, users can create a customized profile revealing information about themselves. They can post text, photos and multimedia which is shared with any other users that have agreed to be their "friend", or, with a different privacy setting, with any reader. Users can also utilize various embedded apps, such as Facebook Messenger, join common-interest groups, and receive notifications of their friends' activities. The accounts of "Don Stevenson" and "Donald White" were reported in the CT. The Don Stevenson account was assigned the Facebook user ID 100012891004557, with a registered e-mail address of RUNDONRUN@YAHOO.COM and the use of IP addresses: 124.120.235.50, 219.74.114.109, and 49.145.131.152, which geolocate to Bangkok, Thailand; Singapore; and Cebu City, Philippines, respectively. The Donald White account was assigned the Facebook user ID 100025143570455, with a registered e-mail address of DONWHITECEBU@GMAIL.COM and the use of IP addresses: 172.220.77.181, 2605:a000:bce0:2c00:b17b:8b26:1673:cfbf, and 2605:a000:bcc0:b100:ad38:bd92:2cc3:fd86, which geolocate to Madison, Wisconsin; New Berlin, Wisconsin, and West Allis, Wisconsin, respectively. The CT also provided Facebook account information for the three (3) alleged minor females that the Don Stevenson and Donald White accounts were in contact with, to include IP addresses. The CT indicated that the three IP addresses used by the alleged minor females were: 175.158.226.178, 49.151.80.69, and 180.190.171.56, all three of which geolocated to the Philippines.

7. The following Facebook messenger chats¹ were also provided in the CT:

a. Chats between the Don Stevenson account and an unidentified female A.L. account on September 22, 2017:

[Don Stevenson (100012891004557) - 09/22/2017 2:46:37am PDT]
If ur here, I give you a big hug.

[A.L. (100014305757229) - 09/22/2017 2:46:55am PDT]
heheehe

[Don Stevenson (100012891004557) - 09/22/2017 2:47:21am PDT]
and your first kiss.. ha ha ha.. joking again.

[A.L. (100014305757229) - 09/22/2017 2:47:33am PDT]
hmmmmn

[Don Stevenson (100012891004557) - 09/22/2017 2:48:36am PDT]
on your cheek

[Don Stevenson (100012891004557) - 09/22/2017 2:50:13am PDT]
And boobs..

b. Chats between the Donald White account and a Minor Victim 1 (here after referred to as MV1) account on May 14, 2018:

Donald White (100025143570455) - 2018/05/14 8:12am PDT
We can take shower?

MV1 (100023948806018) - 2018/05/14 8:13am PDT
yes

Donald White (100025143570455) - 2018/05/14 8:16am PDT
Thank you in advance

MV1 (100023948806018) - 2018/05/14 8:16am PDT
ok

¹ Facebook Messenger is a chat application in which which allows individual or a group of Facebook users to engage in online chats. Facebook and Facebook Messenger are both applications which can be accessed on both a computer, as well as a mobile device, such as a cellphone or tablet.

Donald White (100025143570455) - 2018/05/14 8:16am PDT
We can be lovers?

MV1 (100023948806018) - 2018/05/14 8:16am PDT
ok

c. Chats between the Donald White account and MV1 on May 21-22, 2018:

MV1 (100023948806018) - 2018/05/21 11:06pm PDT
How old ar you

Donald White (100025143570455) - 2018/05/21 11:07pm PDT
50 ... and you?

Donald White (100025143570455) - 2018/05/21 11:10pm PDT
How old are you?

MV1 (100023948806018) - 2018/05/21 11:56pm PDT
13

Donald White (100025143570455) - 2018/05/22 12:10am PDT
Oh. So young. I will be kind and respectful

d. Chats between the Donald White account and an unidentified female S.E. account
on April 17, 2018:

Donald White (100025143570455) - 2018/04/17 10:51pm PDT
My friend asks if you are a virgin

S.E. (100014674219418) - 2018/04/17 10:52pm PDT
Yes I'm virgin

Donald White (100025143570455) - 2018/04/17 10:52pm PDT
We respect that

S.E. (100014674219418) - 2018/04/17 10:52pm PDT
Hah

Donald White (100025143570455) - 2018/04/17 10:53pm PDT
But we can cure that if you wish

[...]

S.E. (100025143570455) - 2018/04/17 11:00pm PDT

Can you show boobs on video call?

Additionally in the CT, the Don Stevenson and Donald White accounts were linked by machine cookies to a third account which used the username “Don Stenson.” Facebook provided the associated account via “cookie” technology. “Cookies” are a small text file created by a website that is stored in the user’s computer either temporarily or permanently on the hard disk. “Cookies” provide a way for the website to recognize you and keep track of your preferences. This information indicated all three Facebook accounts were being logged into using the same electronic device.

8. An HSI liaison to NCMEC conducted research into the various combinations of the first and last names and dates of birth for the White/Stevenson/Stenson Facebook accounts. The HSI liaison identified an individual named: Donald Arthur STENSON, DOB: XX/XX/1956, with an associated address of: 2939 S. 101st St., Milwaukee, WI 53227.

9. As noted above, the CT provided the IP addresses used by the White/Stevenson accounts to log into Facebook. On September 14, 2018, a DHS summons was sent to Charter Communications, requesting subscriber information on IP addresses: 172.220.77.181, 2605:a000:bce0:2c00:b17b:8b26:1673:cfbf, and 2605:a000:bcc0:b100:ad38:bd92:2cc3:fd86, which were IP addresses associated with the Donald White account. On September 14, 2018, Charter responded to the summons indicating that IP addresses: 2605:a000:bce0:2c00:b17b:8b26:1673:cfbf and 2605:a000:bcc0:b100:ad38:bd92:2cc3:fd86 were registered to John Burgdorff, XXXXX, West Allis, WI 53227, XXXXX@wi.rr.com, XXX-XXX-1463 and XXX-XXX-9792. It also indicated that IP address: 172.220.77.181 is registered to: Ellen Jessen, XXXX, Madison, WI 53714, XXX-XXX-7046, and XXXXX@charter.net.

There were no DHS summonses served on the IP addresses associated with the Don Stevenson account, as those addresses were based in Thailand and the Philippines.

10. As the investigation continued, HSI conducted a search into STENSON's travel history. HSI confirmed that STENSON has traveled to the Philippines on multiple occasions since 2007, most recently between on or about January 6, 2019 and on or about January 22, 2019. Since November of 2015, Philippine travel records indicate that STENSON arrived from Bangkok, Thailand to either Manila or Cebu, Philippines, later departing from Manila or Cebu to Bangkok. In addition to locating travel records, the HSI Attaché in Manila worked with Philippine authorities to identify and confirm the ages of the three possible minor female victims cited in the CT.

11. On March 21, 2019, the HSI Attaché in Manila contacted HSI Milwaukee. Between March 18, 2019 and March 21, 2019, HSI Manila, with the assistance of the HSI Manila Transnational Criminal Investigative Unit (TCIU), located and identified four (4) victims who are Philippine nationals that described sexual acts and conversations that took place between themselves and STENSON. One of the victims is now an adult, but was sexually abused as a minor, and the other three (3) victims are 13, 15, and 16 years of age. The four victims positively identified STENSON as the person who engaged in sexual activity with them by encircling the picture of STENSON through a photographic line-up.

12. During an interview by Philippine authorities, one of the four minor females stated that she met STENSON in 2017, when she was 12 years old. She stated that in October 2017, she and other underage minor victims met STENSON at his hotel room at the Hotel Le Carmen in Cebu, Philippines, and proceeded to masturbate him while STENSON fondled their breasts. She stated that after they finished, STENSON paid each of the minors money. She stated that she would

masturbate STENSON once a week over the course of three weeks. She further stated that in addition to money, STENSON gave her gifts, including food, clothing, a laptop, a cellphone and a tablet. Additionally, she stated that STENSON used a Facebook account with the username “Don Chonmanee.”

13. On May 8, 2019, federal search warrants for the following Facebook accounts: Don Stevenson (FB ID#: 100012891004557), Donald White (FB ID#: 100025143570455), Don Stenson (FB ID: 1529468944), and Don Chonmanee (FB ID: 100009337719641) were issued by U.S. District Court for the Eastern District of Wisconsin and served on Facebook on May 8, 2019.

14. On May 17, 2019, Facebook responded to the search warrants on the accounts for: Don Stevenson (FB ID#: 100012891004557), Donald White (FB ID#: 100025143570455), Don Stenson (FB ID: 1529468944), and Don Chonmanee (FB ID: 100009337719641). The search warrant returns showed the IP addresses used to log into the accounts, as well as message logs and transcripts between those accounts and other Facebook users on Facebook Messenger. Further, the search warrant returns contained the pictures and messages for each account. Each account contained pictures shared by the account user of an individual who appears to be STENSON. Based on my training and experience, the machine cookies for each Facebook account, and my review of the search warrant return data for each Facebook account, it appears the Facebook user for the Stevenson/White/Chonmanee/Stenson accounts are same user based on the photos that look like the same person, that being STENSON, and the conversations contained in each account whereby the user is chatting with what appear to be minors in a sexual manner. Further, the Facebook users, using each Facebook account, indicated they planned to travel to the Philippines and expressed an interest in engaging in sexual activity with minor females.

15. After reviewing the full Facebook search warrant returns for each account, the following is a small example of some of the Facebook messenger chats relevant to this investigation:

a. Chats between the Stevenson account and A.L. are as follows:

-9/22/2017 - 09:42:52 UTC – Stevenson: ahahaha.. my excitement might include an erection.. ha ha ha.. sorry joke.
-9/22/2017 – 09:46:37 UTC – Stevenson: If ur here, I give you a big hug.
-9/22/2017 – 09:46:55 UTC – A.L.: hehehe
-9/22/2017 – 09:47:21 UTC – Stevenson: and your first kiss.. ha ha ha.. joking again.
-9/22/2017 – 09:48:36 UTC – Stevenson: on your cheek
-9/22/2017 – 09:50:13 UTC – Stevenson: And boobs...
-9/23/2017 – 11:35:44 UTC – Stevenson sends a picture that appears to be STENSON, holding up two (2) Hershey chocolate bars and one (1) Kit-Kat bar
-9/25/2017 – 12:44:45 UTC – Stevenson: And you want me to keep the camera on when I take a shower? ha ha ha
9/25/2017 – 12:47:25 UTC: Stevenson: Do you want to see my penis or banana before you close the call?

b. Chats between the Stevenson account and Minor 1, which is the account of an identified minor, are as follows:

-07/02/2017 – 11:14:52 UTC – Stevenson: Ohh..yes. U need the cp. I understand. And after bonding, it is possible.

NOTE: in this context, “cp” stands for cell phone

[...]

-07/02/2017 – 11:17:31 UTC – Stevenson: Do you study school, my dear?
-07/02/2017 – 11:17:50 UTC – Minor 1: Yes why my daer
-07/02/2017 – 11:18:27 UTC – Stevenson: Grade 7?
-07/02/2017 – 11:19:24 UTC – Minor 1: No grade 8na ako my deat
-07/12/2017 – 06:53:34 UTC – Stevenson: we will meet and bond next month
-07/12/2017 – 06:57:18 UTC – Minor 1: yes I waht your bonding next month

c. Chats between the Stevenson account and Minor 2, which is the account of another identified minor, are as follows:

-07/10/2017 – 23:54:27 UTC – Minor 2: Don u give cellphone
-07/10/2017 – 23:54:38 UTC – Minor 2: Pleass
-07/10/2017 – 23:55:17 UTC – Stevenson: yesss..... after bonding.. okay..
-07/10/2017 – 23:55:48 UTC – Minor 2: What bonding
-07/10/2017 – 23:56:13 UTC – Stevenson: I don’t know.. ha ha..

[...]

-07/10/2017 – 23:56:31 UTC – Stevenson: bf/gf bonding? Ha ha ha

d. Chats between the Stevenson account and Minor 3, which is the account of another identified minor are as follows:

-11/25/2017 – 06:01:42 – Minor 3 sends Stevenson a picture of three young females who appear to be in the back of a vehicle. The female closest to the camera is wearing a black t-shirt with white lettering and a cartoon monster on it.

****NOTE the identities of the three females have not been established****

-11/25/2017 – 06:01:53 UTC – Minor 3: On going now

-11/25/2017 – 06:03:20 UTC – Stevenson: Ok. Don't get wet.

-11/25/2017 – 07:57:19 UTC – Minor 3 sends Stevenson nine (9) photographs. The images are of the female in the black t-shirt with white lettering and a cartoon monster and who appears to be with STENSON, in a room that appears to have similar features to a room at Hotel Le Carmen, which is the same hotel room the victims identified as the one where they would meet STENSON.

e. Chats between the Stevenson account and Minor 4, which is the account of another identified minor, are as follows:

-03/20/2018 – 13:10:39 UTC – Stevenson: Matt does not know when he will go to Cebu

-03/20/2018 – 13:12:11 UTC – Minor 4: Oh my god im excited to see matt

-03/20/2018 – 13:14:30 UTC – Stevenson: I will tell him he should go there.. He really likes to make love to pregnant girls

****NOTE: as explained below, Minor 4 was forensically interviewed and stated that her birthday is June 4, 2001 and she was 17 years old and was four (4) months pregnant when she had sexual intercourse with STENSON****

f. Chat between the Stevenson account and Vhasin Akohw Touh are as follows:

-08/20/2017 – 09:22:52 UTC – Stevenson: text me.. 09398220050

-09/17/2017 – 08:34:23 UTC – Stevenson: I know.. u will chupa or anal sex.. But NO tongue kiss.. No french kiss!!

-09/17/2017 – 08:34:48 UTC – Vhasin: Hahahahahahah noooo

-11/04/2017 – 09:15:20 UTC – Vhasin: And you have another ring for me?

-11/04/2017 – 09:16:48 UTC – Stevenson: not until after your debut².. An engagement ring

² Through my training and experience, I have come to understand the word "debut" means 18th birthday.

-11/04/2017 – 10:59:59 UTC – Stevenson sends a picture of an individual who appears to be STENSON with another individual who appears to be John Burgdorff³.

-02/12/2018 – 04:19:26 UTC – Vhasin sends Stevenson a picture of what appears to be two young females, both with dark colored hair, one in a dark colored shirt and the other in a white colored shirt, riding in what appears to be the back of a taxi

16. Further review of the Facebook Messenger chats found chats between the Stevenson account and another Facebook user “Jon Bedford”. A sample of the chats between Stevenson and Bedford are as follows:

-09/03/2019 - 04:17:28 UTC – Stevenson: I already was well over \$5K into it with the trip back in '11, so I think most of the hard work is done. It is a matter of setting a few conditions on future donations.

-09/03/2019 - 04:18:38 UTC - Jon Bedford: So, not good for me to be involved at all

-09/03/2017 - 04:18:45 UTC - Stevenson: The money ultimately doesn't matter.. It is our own feeling of happiness that matters.

-09/03/2017 - 04:19:00 UTC - Jon Bedford: But I get none of that

-09/03/2017 - 04:19:02 UTC – Stevenson: Ohh I have no emotional stake in it at all.

-09/03/2017 - 04:19:27 UTC - Jon Bedford: Ahhhh you are scamming her then

-09/03/2017 - 04:19:32 UTC - Stevenson: It is a matter of you being in the same place at the same time as her to "collect"

-09/03/2017 - 04:19:52 UTC - Jon Bedford: I was 3 months ago

-09/03/2017 - 04:19:58 UTC - Stevenson: I wouldn't call it scamming. I am calling it, bonding.

-09/03/2017 - 04:20:10 UTC - Jon Bedford: Screwing

-09/04/2017 – 14:12:01 UTC – Stevenson: Weird because any gal in my stable that I told to take off for any days other than maybe exams, they'd do it.

-09/4/2017 – 14:12:42 UTC - Jon Bedford: And she will, as long ad she doesn't miss volleyball

-09/04/2017 – 14:13:42 UTC - Jon Bedford: She has a tournament in October in bohol

-09/04/2017 – 14:14:11 UTC - Jon Bedford: But still doesn't know the exact dates

-09/04/2017 – 14:14:13 UTC - Stevenson: You should go watch it.. ha ha.

-09/04/2017 – 14:14:37 UTC - Stevenson: Maybe it would be awkward

-09/04/2017 – 14:14:45 UTC - Jon Bedford: I already said. But she'll be with team mates

-09/04/2017 – 14:14:52 UTC - Jon Bedford: Yeah

³ As noted earlier, John Burgdorff is the individual whose name is registered with Charter Communications as the user of IP addresses used by the Donald White account, and as explained below, is the owner of 2939 S. 101st St., West Allis, WI where STENSON was located and arrested.

-09/04/2017 – 14:15:38 UTC – Stevenson: Yeah.. it's a high school thing.. imagine a "fan" following a mature male fan following a H.S. team in US or almost anywhere for that matter.

-09/04/2017 – 14:16:10 UTC - Jon Bedford: No way is it that bad over there

-09/04/2017 – 14:16:38 UTC - Jon Bedford: Only a few of her friends would care

-09/04/2017 – 14:17:43 UTC - Jon Bedford: I asked her if her mom or brother asks where she gets the money

-09/04/2017 – 14:18:22 UTC - Jon Bedford: She just says...a friend. And they accept it at that

-09/04/2017 – 14:18:31 UTC – Stevenson: That's how it is here.

-09/04/2017 – 14:19:00 UTC - Jon Bedford: Where's your nurses

-09/04/2017 – 14:19:13 UTC – Stevenson: They went home after the massage session

-09/04/2017 – 14:19:27 UTC – Stevenson: I didn't want to have to pay them overtime.

-09/04/2017 – 14:19:45 UTC - Jon Bedford: They should stay for free

-09/04/2017 – 14:19:56 UTC – Stevenson: Actually they would

-09/04/2017 – 14:20:14 UTC – Stevenson: Like the crew that we rented the room for when you were laid up

-09/05/2017 – 10:51:55 UTC – *Stevenson sends Bedford a picture that appears to be STENSON laying in bed with two younger looking females, with one of them smiling at the camera*

-09/05/2017 – 10:52:12 UTC – Bedford: Wow

-09/05/2017 – 10:52:18 UTC – Stevenson: Barring an accident on the way, yeah..

-09/05/2017 – 10:52:29 UTC – Stevenson: Gotta get a last minute massage..

-09/05/2017 – 10:53:09 UTC – Bedford: Ok. Say hi to smiling girls

-09/05/2017 – 10:53:17 UTC – Stevenson: [Minor 4] and [Minor 3]

-09/05/2017 - 10:53:51 UTC - Jon Bedford: Birthday for [Minor 3], soon?

-09/05/2017 - 10:54:03 UTC - Jon Bedford: 23rd ??

-09/05/2017 - 10:54:49 UTC - Stevenson: yes.. should I give her something for you?

-09/05/2017 - 10:55:09 UTC - Jon Bedford: My pe....A kiss

- 10/16/2017 – 05:22:35 UTC – Stevenson: Room 204 has been reserved for the 26th of October.

As noted below, “Jon Bedford” appears to be STENSON’s friend John BURGDORFF, and according to Philippines travel records, BURGDORFF arrived in the Philippines on October 26, 2017.

-10/26/2017 – 06:55:10 UTC – Stevenson: Canoogs are asking me if you are arriving today.. LOL

-10/26/2017 – 06:55:55 UTC - Jon Bedford: I told kc⁴. This morning. But asked her to keep it secret until I m back November 2
 -10/26/2017 – 06:56:10 UTC – Stevenson: good
 -10/26/2017 – 06:56:13 UTC - Jon Bedford: Else they will keep bugging me
 -10/26/2017 – 06:56:31 UTC – Stevenson: well, if you get too bored or lonely, they will come running
 [...]
 -10/26/2017 – 06:59:25 UTC - Jon Bedford: First, tonight.
 -10/26/2017 – 06:59:38 UTC - Jon Bedford: Kc may come see me
 -10/26/2017 – 06:59:55 UTC – Stevenson: Yeah.. if u stick by your guns, Kristel might some how mysteriously appear tonight.. LOL
 -10/26/2017 – 07:00:34 UTC - Jon Bedford: I have some phone numbers in the phone. But not kc number
 -10/26/2017 – 07:00:54 UTC – Stevenson: just send her your number and put a load⁵ on it when u get to the hotel
 -10/26/2017 – 07:01:21 UTC – Stevenson: Or just chat her on FB when u get to Cebu.
 -10/26/2017 – 07:01:43 UTC - Jon Bedford: Ok. I guess I better get going

-11/04/2017 – 08:37:54 UTC - Jon Bedford: They ll arrive at 5 at the earliest
 -11/04/2017 – 08:40:35 UTC – Stevenson: They are waiting for taxi now
 -11/04/2017 – 09:56:02 UTC – Stevenson: Ready to roll?
 -11/04/2017 – 09:56:40 UTC - Jon Bedford: Im done. But they havent left
 -11/04/2017 – 09:57:07 UTC – Stevenson: Ok. Come when they are gone.

17. Chats between the Stevenson account and MSK, who is an identified victim who was interviewed by Philippine authorities in March 2019 and disclosed sexual encounters with STENSON in 2016 in which STENSON gave her money afterwards when she was under 18 years of age, are as follows:

-04/30/2017 - 04:37:48 UTC – MSK: Hi Don!
 -04/30/2017 - 04:39:03 UTC - Stevenson: Hi [MSK]!
 -04/30/2017 - 04:39:18 UTC – MSK: How are you?
 -04/30/2017 - 04:40:15 UTC - Stevenson: I am fine today
 -04/30/2017 - 04:40:29 UTC – MSK: Good (y)
 -04/30/2017 - 04:41:15 UTC - Stevenson: Did you ever meet my friend John?
 -04/30/2017 - 04:41:22 UTC – MSK: No!

⁴ KC is an identified victim in this case.

⁵ In my training and experience, I know “load” to mean putting money and minutes on a cellular telephone.

-04/30/2017 - 04:42:13 UTC – Stevenson: Ohh.. he is lonely today..
 -04/30/2017 - 04:42:43 UTC – MSK: what his fb name?
 -04/30/2017 - 04:42:52 UTC - Stevenson: jon bedford
 -04/30/2017 - 04:44:00 UTC – MSK: why he's lonely?
 -04/30/2017 - 04:45:41 UTC – Stevenson: no gf or lover.... :D
 -04/30/2017 - 04:46:05 UTC – MSK: hehehe sadlife
 -04/30/2017 - 04:46:54 UTC – Stevenson: Not so sad.. he has money to go anywhere and do anything he wants.
 -04/30/2017 - 04:47:43 UTC – MSK: Ah Ok
 -04/30/2017 - 04:57:53 UTC – MSK: what you doing now?
 -04/30/2017 - 04:59:33 UTC – Stevenson: I am going to run at the sport center
 -04/30/2017 - 04:59:57 UTC – MSK: Ok! are you in cebu dear?
 -04/30/2017 - 05:01:31 UTC – Stevenson: yes.. at my hotel
 -04/30/2017 - 05:01:38 UTC – Stevenson: Are you free now?
 -04/30/2017 - 05:01:47 UTC – Stevenson: to entertain my friend
 -04/30/2017 - 05:02:13 UTC – MSK: Yes!
 -04/30/2017 - 05:02:29 UTC – Stevenson: okay. how soon can you be here at the hotel?
 -04/30/2017 - 05:03:49 UTC – MSK: Your hotel still at La Carmen?
 -04/30/2017 - 05:03:55 UTC – Stevenson: Yes..
 -04/30/2017 - 05:04:11 UTC – MSK: Okay
 -04/30/2017 - 05:04:27 UTC – MSK: what time you want i go there?
 -04/30/2017 - 05:04:57 UTC – Stevenson: I want to exercise, but my friend hurt his ankle yesterday so he is stuck in his room and needs you to be his nurse.. ha ha ha.
 -04/30/2017 - 05:05:01 UTC – Stevenson: make him feel better.
 -04/30/2017 - 05:05:04 UTC – Stevenson: Now..
 -04/30/2017 - 05:05:08 UTC – Stevenson: Can you come now?
 -04/30/2017 - 05:05:27 UTC – MSK: Yes!
 -04/30/2017 - 05:05:36 UTC – MSK: you just text me
 -04/30/2017 - 05:05:53 UTC – Stevenson: Why text? Just come now.. I don't want to text.
 -04/30/2017 - 05:06:16 UTC – MSK: Okay!
 -04/30/2017 - 05:06:39 UTC – Stevenson: How will you come..
 -04/30/2017 - 05:06:50 UTC – MSK: i'm just taking jeep
 -04/30/2017 - 05:06:56 UTC – Stevenson: Great..
 -04/30/2017 - 05:07:04 UTC – Stevenson: When you arrive go to room 304
 -04/30/2017 - 05:07:08 UTC – Stevenson: across from my room
 -04/30/2017 - 05:07:26 UTC – Stevenson: **Stevenson sends a picture of a white man, with grey hair, grey mustache, with no shirt, wearing blue bottoms, standing in-front of a sign that reads “Cebu Westown Lagoon”**
 -04/30/2017 - 05:07:34 UTC – Stevenson: That is my friend.
 -04/30/2017 - 05:07:48 UTC – Stevenson: You can meet and talk with him.
 -04/30/2017 - 05:08:01 UTC – Stevenson: I promise you that you will be happy..
 -04/30/2017 - 05:10:04 UTC – MSK: Cebu Westown Lagoon is belong in Mango?
 -04/30/2017 - 05:10:32 UTC – Stevenson: No... that two days ago.. .
 -04/30/2017 - 05:10:41 UTC – Stevenson: U know where LeCarmen is

-04/30/2017 - 05:10:48 UTC – MSK: yes
-04/30/2017 - 05:11:09 UTC – Stevenson: Can you come now plz.
-04/30/2017 - 05:11:17 UTC – MSK: okay
-04/30/2017 - 05:11:26 UTC – Stevenson: U can text me if there are any problems..
09398220050
-04/30/2017 - 05:11:27 UTC – MSK: i log out now!
-04/30/2017 - 05:12:04 UTC – Stevenson: Okay.. Just come to room 304... I will be at the sports center, but my friend is waiting to talk with you.. and share with you

It should be noted that, as explained below, STENSON was indicted and subsequently arrested on July 12, 2019, at the residence of John BURGDORFF. At the time of the arrest, BURGDORFF was home, and I had interactions with him. The individual shown in the picture Stevenson sent to MSK appears to be John BURGDORFF.

18. On September 3, 2019, HSI Manila TCIU interviewed MSK and Minor Victim 3. During the interview MSK stated that sometime in 2017, STENSON told her that he gave her contact number to BURGDORFF (Jon Bedford). She added that she later received a text message from BURGDORFF asking her to meet him at Hotel Le Carmen, where she engaged in sexual intercourse, afterwhich, he paid her approximately \$2000 PHP. During the interview with Minor Victim 3, she stated that STENSON contacted her via Facebook Messenger, to come to Hotel Le Carmen and meet Jon (BURGDORFF). She stated that on one occasion she and two other minor females were naked and masturbated BURGDORFF while he fondled their breasts. She stated that he paid each of them approximately \$500 PHP. Additionally, Minor Victim 3 stated that while at Hotel Le Carmen, STENSON would stay in Room 302, and Jon (BURGDORFF), would stay in Room 204.

19. After the March 2019 interviews of the minor victims by Philippine authorities, the Don Chonmanee account engaged in chats with Facebook user Jerine Canoog, regarding the interviews. A sample of the chats are as follows:

-03/21/2019 - 06:51:51 UTC - Don Chonmanee: I hope you are as well.
-03/21/2019 - 06:52:15 UTC – Jerine Canoog: because I feel nervous here
-03/21/2019 - 06:52:27 UTC - Don Chonmanee: Why nervous?
-03/21/2019 - 06:52:31 UTC - Don Chonmanee: Did NBI contact you?
-03/21/2019 - 06:53:25 UTC – Jerine Canoog: Some people calling me and said [Minor Victim XXX] and Dianne pick up the NBI us that true
-03/21/2019 - 06:53:41 UTC - Jerine Canoog: No dear
-03/21/2019 - 06:53:57 UTC - Don Chonmanee: Dianne? or Dannieann?
-03/21/2019 - 06:54:19 UTC – Jerine Canoog: It's that true
-03/21/2019 - 06:54:08 UTC – Jerine Canoog: I don't know
-03/21/2019 - 06:54:41 UTC - Don Chonmanee: Why don't you talk with [Minor Victim XXX] and tell me about it.
-03/21/2019 - 06:54:49 UTC - Don Chonmanee: She was crying and worried about me.
-03/21/2019 - 06:55:15 UTC – Jerine Canoog: that's why I stop kc and Daisy chatting u
-03/21/2019 - 06:55:26 UTC - Don Chonmanee: Thank you very much. I unfriended them.
-03/21/2019 - 06:55:26 UTC – Jerine Canoog: Reall
-03/21/2019 - 06:55:31 UTC - Don Chonmanee: And they should delete all chats.
-03/21/2019 - 06:55:40 UTC – Jerine Canoog: Okie dear
-03/21/2019 - 06:56:13 UTC - Don Chonmanee: And tell them that my mother is sick and I must go to take care of her so that my trip to Cebu is cancelled. Tell them I am very sorry.
-03/21/2019 - 06:57:00 UTC - Don Chonmanee: And you also can delete all of our chats.
-03/21/2019 - 06:57:41 UTC - Don Chonmanee: And only chat with me if you have some news. I don't want anything bad to happen to anyone.

20. The Don Chonmanee account also engaged in chats about the March 2019 interviews with Facebook user Mischelle Rosales. A sample of the chats are as follows:

-03/24/2019 - 14:00:10 UTC - Don Chonmanee: Because of language difficulties, I am not clear on the NBI issue, but I understand there were accusations and interrogations. And my name was one of interest.
[...]
-03/24/2019 - 14:02:04 UTC: Don Chonmanee: I understand that Shein and Jannah and Danieann were taken to a police station where they were asked a lot of questions.
-03/24/2019 - 14:02:18 UTC: Don Chonmanee: This is what I gathered from what Daisy told me.
-03/24/2019 - 14:02:51 UTC – Mischelle Rosales: Yes, you're correct.
-03/24/2019 - 14:04:32 UTC – Mischelle Rosales: 1st day, the NBI went here and asked for them (shein and other kids). They were interviewed inside the house of Diane.
-03/24/2019 - 14:04:51 UTC - Don Chonmanee: Shein told me that she was very concerned for my safety because of the questions and allegations being made. When she said that, I was shocked.
-03/24/2019 - 14:05:17 UTC - Don Chonmanee: Is that the house of Jannah? Or house of Danieann?

-03/24/2019 - 14:06:11 UTC – Mischelle Rosales: As far as I've noticed, there was no proper consent from each parents of the said 'victims'. It was Anabel, mother of Dani Ann whose the only guardian who went inside.

-03/24/2019 - 14:06:59 UTC – Mischelle Rosales: They were interviewed in the house of Diane. Not Dani Ann.

-03/24/2019 - 14:08:09 UTC - Don Chonmanee: Were they said to be 'victims' of human trafficking, child prostitution, statutory rape or other terrible things like that?

-03/24/2019 - 14:09:49 UTC - Don Chonmanee: It is very very upsetting to say the least.

-03/24/2019 - 14:09:30 UTC - Don Chonmanee: I need to know how anyone got my name and why questions were being asked about me.

-03/24/2019 - 14:09:49 UTC – Mischelle Rosales: Supposedly, the kids are afraid to tell anything because 'hello, they're minors, they don't have the right mindset yet to answer those types of allegations and more over, there was no consent from the parents itself and Anabel is not considered as their guardian because she's not the legit parent. So I would really take it as invalid investigation. How come they asks or interview minors without proper consent from parents and with the parents? NBI will surely manipulate the kids minds easily.

-03/24/2019 - 14:11:54 UTC – Mischelle Rosales: Well, they were asked if they had an intercourse with you. I'm not yet sure what they'd answer, I need to clarify that to shane and ask what they told the NBI cause its really upsetting.

-03/24/2019 - 14:12:15 UTC - Don Chonmanee: Well, it upset me enough to cancel all plans to return and that is a plane ticket of almost 20,000 pesos that is not refundable. But any price is worth it to not be held falsely by corrupt police or NBI trying to get some kind of bribe money through threats of criminal charges.

-03/24/2019 - 14:14:24 UTC - Don Chonmanee: Shein told me that she told them that I was bf of her big sister. Unfortunately, if they took her literally, that is problematic because KC won't be 18 until June. It was when they asked her what my relationship to the family was.

[...]

-03/24/2019 - 14:18:42 UTC - Don Chonmanee: I recall Mary Grace had chatted with me a few times and even asked to visit me at my hotel, but I always turned her down because I didn't want any trouble.

-03/24/2019 - 14:19:32 UTC - Don Chonmanee: I should not have ever chatted with her.

-03/24/2019 - 14:20:50 UTC – Mischelle Rosales: I see. Do you still have your convo woth those girls? You can always take a screenshot of it im case they will have false accusations from you.

-03/24/2019 - 14:21:57 UTC - Don Chonmanee: I have unfriended and deleted almost everyone from my FB accounts.

-03/24/2019 - 14:22:35 UTC – Mischelle Rosales: There are really people who have crazy minds. They don't even know What they're dealing with and how bad the effects of it to you.

-03/24/2019 - 14:23:21 UTC – Mischelle Rosales: But you can still open those messages even if you unfriend them. It will remain in your messenger unless you delete it.

-03/24/2019 - 14:23:48 UTC - Don Chonmanee: My stomach is so queasy and I feel so sad. I was looking so forward to seeing off the Canoog family and maybe even visiting them on my cancelled trip.

-03/24/2019 - 14:24:05 UTC - Don Chonmanee: I have deleted all convo's

-03/24/2019 - 14:24:14 UTC – Mischelle Rosales: Ah I see.

-03/24/2019 - 14:24:36 UTC - Don Chonmanee: But if they open the chat's on her end, I am sure that I'll be vindicated.

-03/24/2019 - 14:24:42 UTC - Don Chonmanee: So at least they can't be used against me.

21. Between June 25, 2019 and June 27, 2019, forensic interviews were conducted on multiple minor victims who were identified by law enforcement who reside in the Philippines. During the interviews, the females all disclosed having engaged in sexual encounters with STENSON, to include sexual intercourse, while they were under 18 years of age. Some of the minors stated they communicated with STENSON via Facebook and text messaging. Each of them also explained that STENSON would pay them in Philippine pesos after the sex acts were completed, and would also give them gifts to include food, clothing, cellphones, computers, and payment for schooling. During the interviews, several of the minors described STENSON as having a grey and black laptop computer (brand unknown), a black HP laptop computer, an Apple iPhone, a Samsung cellphone, and a Samsung tablet. Minor 3 and Minor 4 both stated that STENSON sent their mother, D.C., money via Western Union. After learning this information, records were requested via subpoena from Western Union on June 28, 2019. On July 1, 2019, I received a response from Western Union showing that STENSON sent D.C. \$123.03 U.S. dollars (USD) on June 2, 2017, \$78.46 USD on October 29, 2017, and \$60.68 USD on January 9, 2018. The records show that STENSON was in Thailand when he sent the money to D.C. on all three occasions.

22. After having reviewed all of the evidence to include the facts contained in this affidavit, there was probable cause to believe STENSON had engaged in illicit sexual conduct with minors

and as such on July 12, 2019, I arrested STENSON with assistance from the City of West Allis Police Department, at the residence of 2939 S. 101st St., West Allis, WI which is owned by John Burgdorff.

23. On July 9, 2019, STENSON was indicted by a grand jury in the U.S. District Court for the Eastern District of Wisconsin on four (4) counts of engaging and attempting to engage in illicit sexual conduct in foreign places in violation of 18 U.S.C. §§ 2423(c) and (e) and on four (4) counts of sex trafficking minors in violation of 18 U.S.C. §§ 1591(a)(1), 1591(b)(1) and 1596(a)(1).

24. A review of secondary inspection records of STENSON upon entry into the United States show STENSON stating that he has lived in Thailand for many years. A review of STENSON's application for a United States passport, revealed that he lists 136/378 Ramkhamhaeng Road, SOI 24, Bangkok, Thailand as his current mailing address. Additionally, STENSON frequently remarks in his Facebook Messenger chats that he lives in, and maintains properties in Thailand. Furthermore, STENSON used IP addresses which geolocate to Bangkok, Thailand to log into his various Facebook accounts.

25. HSI Attache Bangkok was contacted to assist in identifying STENSON's residence, as well as request assistance from the Royal Thailand Police (RTP) in obtaining additional evidence of violation of United States laws, but also possible violations of Thailand law. HSI Bangkok and the RTP were able to positively identify the location of STENSON's residence in Bangkok.

26. On August 6, 2019, HSI Bangkok assisted the RTP in executing a search warrant at 136/378 Ramkhamhaeng, SOI 24, Bangkok, Thailand, STENSON's residence in Bangkok, Thailand for possible violations of the laws in the Kingdom of Thailand. During the course of the search warrant at this residence, authorities encountered a Thailand woman who identified

herself as the authorized caretaker for STENSON's condo units, and informed the RTP of another condo unit owned and used by STENSON. RTP subsequently applied for and obtained a search warrant for 138/87 Ramkhamhaeng Road, SOI 24, Bangkok, Thailand, the second residence for STENSON.

27. During the search of both residences, the RTP seized numerous electronic storage devices and media, as well as other documents and evidence. The electronic storage devices and media seized included several flash and thumb drives, mobile phones, external hard drives, Apple iPods, laptop and desktop computers.

28. The seized digital devices and media are in the process of being forensically examined by the RTP. However, the RTP provided a hard drive to HSI Bangkok, which contains forensic "images" of the seized electronic storage devices. Forensic image or copy refers to an accurate reproduction of information contained on an original physical item, independent of the electronic storage device. Prior to the software creating the forensic "image" of the storage media, the software generates a set of hash values utilizing the MD5 and SHA1 algorithms. Upon completion of the imaging process the software generates the hash values again using the same algorithms. If the hash values generated prior to imaging match the hash values generated after imaging is completed, this substantiates that interaction with the storage media for the purpose of obtaining the forensic "image" and did not alter the data in any way— thus creating a gold copy from which all further forensic processing will be utilized while the original device/storage media will be securely stored in evidence.

29. On October 23, 2019, I received a Western Digital Gold 4 TB hard drive (serial number: K4KA363B), from HSI Bangkok, which contains the forensic "images" of the seized devices.

30. STENSON is currently detained at the Waukesha County Jail. While listening to STENSON's jail calls, as provided by the Waukesha County Sheriff's Office, STENSON placed a call to an individual in Reno, Nevada on August 10, 2019. During the call, STENSON informs the individual of the search warrants having been conducted on his Thailand residences, and made the follow statements: "things have taken a turn for the most horribly worst," and "they're going to find some shit."

31. I know through my training and experience as well as through conversations with other law enforcement agents, that each of the devices seized from STENSON's apartment is an electronic device capable of storing data and that the data on these devices could include, among other things, videos and images of the victims and or other minors; evidence of contact between STENSON and the victims and/or between STENSON and other minor victims of sexual abuse and or child sex trafficking; and evidence of contact between STENSON and other individuals in which STENSON is assisting with contacting minors. The devices seized from STENSON may also contain additional electronic evidence of, among other things, STENSON'S travel to and from the Philippines during the charged timeframe (such as emailed or stored reservations, itineraries, or receipts), STENSON'S U.S. citizenship, STENSON'S grooming and or/sexual abuse/sex trafficking of other minor victims—including such things as message logs, chats and or emails.

32. I know, through my training and experience as well as conversations with other law enforcement agents, that individuals involved in the sexual abuse of children often record or document the sexual abuse, as well as behaviors and activities associated with or contributing to the sexual abuse, and that this documentation can be either intentional or inadvertent. Examples of documentation may consist of, among other things, photographs or videos of the sexual abuse,

writings about the sexual abuse acts or victims (e.g. journals, fantasy stories, communicating with the victim or communicating with other, like-minded individuals), and evidence of research regarding techniques, methodologies, and/or opportunities related to sexual abuse (e.g. how to “groom” a potential victim, opportunities for sexual abuse in foreign countries, laws regarding sexual abuse of children in various countries, and techniques to avoid detection or to allay suspicions).

33. Given the ubiquity of computer media devices and the highly prevalent role that such devices play in individuals' day-to-day activity, it is unsurprising that, as my training and experience as well as conversations with other law enforcement agents have indicated, it is common to find evidence of child sexual abuse—including, for example, evidence of a relationship between an offender and a victim, evidence of communications between an offender and a victim, evidence that corroborates a victim's account of an offender's use of computer-related grooming techniques, evidence that demonstrates an offender's use of computer media to groom a victim, evidence that confirms an offender's location at the scene of the alleged abuse, and evidence of an offender's efforts to lure, groom, or maintain potential victims—on an offender's computer media devices, even if the child-sexual-abuse does not directly involve the use of computer media.

34. From my training and experience as well as conversations with other law enforcement officer involved in child exploitation offenses, I know that individuals involved in child-exploitation offenses often seek to maintain evidence of their child exploitation crimes on smaller, more portable computer media devices—such as flash drives, external hard drives, smart phones, and laptop computers—presumably because, among other things, such devices may be more easily hidden or disposed of if the need arises.

TECHNICAL TERMS

35. Based on my training and experience, I use the following technical terms to convey the following meanings:

a. Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device. Several minor victims have stated that they observed STENSON with multiple cellphones, to include a Samsung cellphone, which was turned over to authorities during STENSON’s arrest.

b. Electronic storage devices: Electronic storage devices includes computers, cellular telephones, tablets, and devices designed specifically to store electronic information (e.g., external hard drives and USB “thumb drives”). Many of these devices also permit users to communicate electronic information through the internet or through the cellular telephone network (e.g., computers, cellular telephones, and tablet devices such as an iPad).

c. IP Address: An Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

d. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and

international borders, even when the devices communicating with each other are in the same state.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

36. As described above and in Attachment B, this application seeks permission to search for records and information that might be found on the computers and/or electronic storage devices described in Attachment A. One form in which these records and information might be found is in the forensic image of the device. Thus, the warrant applied for would authorize the seizure of the forensic image files contained on the Western Digital Gold 4 TB hard drive (serial number K4KA363B). Based on my knowledge, training, and experience, I know that electronic devices (and subsequently their forensic image) can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

37. *Probable Cause.* Based on my knowledge, training, and experience, as well as information related to me by agents and others involved in this investigation and in the forensic examination of digital devices, I respectfully submit that there is probable cause to believe that the records and information described in Attachment B will be on the storage device described in Attachment A for at least the following reasons:

- a. Based on my training and experience, as well as my discussions with others involved in child exploitation investigations, I know that computers and computer technology have revolutionized the way in which child exploitation offenses are committed.
- b. Individuals who engage in child exploitation offenses, including travelling in foreign commerce and engaging in illicit sexual conduct in violation of 18 United

States Code Sections 2423 (c) and (e), use the internet and computers to allow them to obtain child exploitation material and/or child-exploitation-related materials in a relatively secure and anonymous way. Individuals who have a sexual interest in children often maintain their child exploitation material and/or child-exploitation-related materials in a digital or electronic format in a safe, secure and private environment, such as a computer. These materials are often maintained for several years and are kept close by. Individuals with a sexual interest in children or images of children also may correspond with and/or meet others to share information and materials; rarely destroy correspondence from other individual interested in child exploitation material and/or child-exploitation-related materials; conceal such correspondence as they do their child exploitation material and/or child-exploitation-related materials; and often maintain lists of names, addresses, and telephone numbers of individuals with whom they have been in contact and who share the same interests in child exploitation.

c. Individuals who engage in the foregoing criminal activity, in the event that they change computers, will often “back up” or transfer files from their old computers’ hard drives to that of their new computers, so as not to lose data, including that described in the foregoing paragraph, which would be valuable in facilitating their criminal activity.

d. Computer files or remnants of such files can be recovered months or even years after they have been downloaded onto an electronic storage medium, deleted, or viewed via the Internet. Electronic files downloaded to an electronic storage medium can be stored for years at little or no cost. Even when such files have been deleted, they can be recovered months or years later using readily-available forensics tools. When a person “deletes” a file on a digital device such as a home computer, the data contained in the file

does not actually disappear; rather, that data remains on the electronic storage medium until it is overwritten by new data. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space – that is, in space on the electronic storage medium that is not allocated to an active file or that is unused after a file has been allocated to a set block of storage space – for long periods of time before they are overwritten. In addition, a digital device’s operating system may also keep a record of deleted data in a “swap” or “recovery” file. Similarly, files that have been viewed via the Internet are automatically downloaded into a temporary Internet directory or “cache.” The browser typically maintains a fixed amount of electronic storage medium space devoted to these files, and the files are only overwritten as they are replaced with more recently viewed Internet pages. Thus, the ability to retrieve “residue” of an electronic file from an electronic storage medium depends less on when the file was downloaded or viewed than on a particular user’s operating system, storage capacity, and computer, smart phone, or other digital device habits.

38. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described in the warrant, but also forensic evidence that establishes how a particular digital device was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the listed forensic images because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). I know from my training and experience that users can access social media sites like, Facebook and video chatting applications/software with both mobile phones

and computers and which such access and evidence can remain on the devices. Further, I know from my training and experience that evidence can remain on storage mediums of wire transfers like those from Western Union. I also know that individuals typically store files on their devices that they upload to social media websites and it is easy to transfer saved image, video or other files from one device to another such as saving a file on a computer and transferring it to an external hard drive or SD card.

- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

39. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the forensic images consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

40. *Manner of execution.* Because this warrant seeks only permission to examine the forensic images already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

CONCLUSION

41. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe violations of Title 18, United States Code §§ 1591(a) and (d); and 2423(c) and (e) have been committed by STENSON, and probable cause exists to believe that contraband, evidence, fruits, and instrumentalities of these violations will be located within the exact forensic images of the electronic devices as described in Attachments A and B.

42. I, therefore, respectfully request that the attached warrant be issued authorizing the search and seizure of the items listed in Attachment A.

ATTACHMENT A

The property to be searched is:

a. One (1) Western Digital Gold 4 TB hard drive (serial number K4KA363B) containing forensic images of: three (3) SanDisk flash drives, one (1) Apacer flash drive, six (6) Kingston flash drives, one (1) Nokia mobile phone, one (1) Dell laptop computer, one (1) PC computer, one (1) Acer external hard drive (serial number: LCEXH0A025215005D63600), one (1) Samsung mobile phone (serial number: R58K73Q17GE) with Globe Network sim card, one (1) Seagate external hard drive (serial number: NAAP0MVJ), two (2) miscellaneous sim cards, one (1) Sony 32GB memory stick, one (1) Tsunami external hard drive, one (1) Samsung flash drive, one (1) Transcend flash drive, one (1) Apple iPod Touch (serial number: DJ6MX153DT75), one (1) Apple iPod Touch (serial number: 8L0269MC75J), one (1) Sony 1GB memory stick) and one (1) HP all-in-one computer (serial number: 18WW2Y5T60), the devices seized from the search of STENSON's apartments on August 6, 2019 at 136/378 Rahkhamhaeng, SOI 24, Bangkok, Thailand, and 138/87 Rahkhamhaeng, SOI 24, Bangkok, Thailand.

The Western Digital Gold 4 TB hard drive is currently at the U.S. Department of Homeland Security Office located at 790 N. Milwaukee Street, Milwaukee, Wisconsin, in evidence.

This warrant authorizes the forensic examination of the forensic images for the purpose of identifying the electronically stored information described in Attachment B.

ATTACHMENT B

1. All records on the forensic images described in Attachment A that relate to violations of 18 USC §§ 1591(a) & (d), and 2423(c) & (e), including:
 - a. Records or information, photographs, videos, notes, documents, or correspondence, in any format or medium, concerning communications about sexual activity with or sexual interest in minors; and
 - b. Records or information, notes, documents, or correspondence, in any format or medium, concerning communications about transferring money.
2. All names, aliases, and numbers stored on the Devices, including numbers associated with the Devices, relating to the identities of those engaged in the sexual activity with or sexual interest in minors.
3. Images, videos or visual depictions of minors to include sexually explicit images, videos or visual depictions.
4. Records and information containing sexual activity or sexual interest in minors, including but not limited to texts, images and visual depictions of/or regarding minors.
5. Any and all information, notes, software, documents, records, or correspondence, in any format and medium, pertaining to the listed violations.
6. Any and all address books, names, and lists of names and addresses of individuals who may have been contacted by use of the computer or by other means for the purpose of committing the violations to include any records or information regarding video chatting or like communication software/applications.
7. The list of all telephone calls made or received located in the memory of the Device that provides information regarding the identities of and the methods and means of operation and communication by those engaged in sexual activity with or sexual interest in minors.
8. Any and all information, notes, documents, records, or correspondence, in any format or medium, concerning membership in online groups, clubs, or services that provide or make accessible sexual activity with or sexual interest in minors.
9. Any and all information, records, documents, invoices and materials, in any format or medium, that concern e-mail accounts, online storage, or other remote computer storage pertaining to the violations.

10. Evidence of user attribution showing who used or owned the Device at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history.